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Centredale
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LAW OFFICES
www.rc.com

Financial Centre
695 East Main Street
P.O. Box 10305
Stamford, CT 06904-2305
203-462-7500
Fax 203-462-7599

Stuart R. Deans
203-462-7506
sdeans@rc.com

February 12, 2002

Via Facsimile & Federal Express

Catherine Garypie, Esq.
Senior Enforcement Counsel
U.S. Environmental Protection Agency (New England)
1 Congress Street
Suite 1100
Boston, MA 02114-2023

Re: **Centredale Manor Superfund Site, North Providence, RI - Supplemental Response to EPA Information Request**

Dear Ms. Garypie:

Enclosed with this letter please find a Supplemental Response submitted pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") submitted by New England Container Co., Inc.

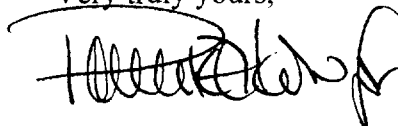
As indicated in the Supplemental Response, NECC is continuing to conduct additional investigations in an effort to obtain information pertaining to the Centredale Manor Superfund Site. NECC reserves its right to further supplement its responses, in the event NECC discovers additional information.

ROBINSON & COLE_{LLP}

Catherine Garypie
Senior Enforcement Counsel
February 12, 2002
Page 2

Thank you for your attention to this submittal.

Very truly yours,

A handwritten signature in black ink, appearing to read "Stuart R. Deans", with a large, stylized flourish at the end.

Stuart R. Deans

SRD:lj
Enclosure

cc: Jerome Muys, Esq. (w/enclosure)
Richard J. Welch, Esq. (w/enclosure)
Leonard Freiman, Esq. (w/enclosure)
Colburn Cherney, Esq. (w/enclosure)
Howard Castleman, Esq. (w/enclosure)
Robert M. Steele, Esq. (w/enclosure)
W. Anthony Fitch, Esq. (w/enclosure)

NEW ENGLAND CONTAINER COMPANY, INC.

**SUPPLEMENTAL RESPONSE TO
CERCLA § 104(e) INFORMATION REQUESTS**

FEBRUARY 8, 2002

This response voluntarily supplements previous submittals in response to Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") Section 104(e) information requests dated February 22, 1999 (the "1999 §104(e) Request") and January 20, 2000 (the "2000 §104(e) Request") provided by New England Container Company, Inc. ("NECC").

NECC has previously provided responses regarding its former operations at 2074 Smith Street, North Providence, Rhode Island (the "Site"). Since the submission of its last response, NECC has engaged in additional efforts to identify customers at NECC's former Centredale facility. Mr. Gene D'Onofrio, the former Vice President of Finance and Director of Operations, NECC, directed a review of documents at NECC's Smithfield facility, as well as archived materials located in a document storage facility in Providence, Rhode Island. Mr. D'Onofrio also had conversations with Richard Costa, a current NECC employee, and Thomas Lussier, a retired NECC employee, as further discussed below, to ascertain whether they had additional recollections as to NECC operations and/or information relevant to customers at the former Centredale facility. While neither of these individuals worked at the Centredale site, they began working at the Company in the early 1970's and had knowledge about the company and customers of the company. Mr. D'Onofrio also reviewed the written statement of Raymond Nadeau prepared by an EPA investigator and signed by Mr. Nadeau on October 27, 2000. Those efforts have resulted in the identification of additional customer names and other information not previously provided to EPA. In order to supplement NECC's responses to the 1999 §104(e) Request and the 2000 § 104(e) Request, NECC has provided the customer names and the other additional information in the form of a voluntary supplemental response to the relevant questions.

NECC is continuing to conduct additional investigation in an effort to obtain information that may be responsive to 1999 §104(e) Request and the 2000 § 104(e) Request. NECC reserves its right to further supplement its previous responses, in the event it discovers additional information.

1999 §104(e) Request

1.c. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including any legal notices, please so indicate here by providing that individual's name, address, telephone number, and FAX number.

Stuart R. Deans, Esq.
Robinson & Cole, LLP
Financial Centre
695 E. Main Street
P.O. Box 10305
Stamford, CT 06904-2305
Tel. (203) 462-7506
Fax (203) 462-7599

1.e. State the dates during which Respondent conducted business at each location listed in response to question 1.d.

NECC formally filed articles of incorporation with the Rhode Island Secretary of State on January 8, 1953. NECC conducted business at 2074 Smith Street, North Providence, Rhode Island from approximately 1952 until some point of time during the summer of 1971. Therefore, NECC hereby amends its previous responses regarding the dates during which it conducted business at the former Centredale facility.

3.b. State the beginning and ending dates of Respondent's operations at the Site.

From approximately 1952 until some point of time during the summer of 1971, NECC conducted business at 2074 Smith Street, North Providence, Rhode Island. NECC filed articles of incorporation with the Rhode Island Secretary of State on January 8, 1953. Mr. Bernard Buonanno, who was responsible for operations at NECC's Centredale facility, maintained his office at the Centredale Site through some point in time during the summer of 1971. Therefore, NECC hereby amends its previous responses to the 1999 § 104(e) Request and the 2000 § 104(e) Request regarding the beginning and ending dates of its operations at the former Centredale facility.

3.c. State the specific dates during which wastes were brought to the Site for use, storage, placement, treatment, recycling, or disposal by Respondent.

In the 1999 § 104(e) Request, EPA defined "waste" or "wastes" to "mean and include trash, garbage, refuse, by-products (including but not limited to dioxin and hexachloroxanthene), solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes." (emphasis added). NECC is, and during the relevant time period (1952-1971), was in the business of reconditioning drums. Because "waste" is defined to include "containers," NECC is responding to this question by listing those entities that arranged to have drums brought to the Site to be reconditioned.

NECC received and reconditioned drums on the Site from 1952 through some point in time during the summer of 1971.

3.q. For each individual and entity which brought wastes to Respondent's facility at the Site:

In the 1999 § 104(e) Request, EPA defined "waste" or "wastes" to "mean and include trash, garbage, refuse, by-products (including but not limited to dioxin and hexachloroxanthene), solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes." (emphasis added). NECC is and, during the relevant time periods (1952-1971), was in the business of reconditioning drums. Because "waste" is defined to include "containers," NECC is responding to this question by listing those entities that brought drums to the Site to be reconditioned.

Pursuant to NECC's continuing efforts described in more detail above, NECC recently discovered a "Christmas Gift List" compiled for the year 1968 (the "1968 Christmas Gift List"). It was NECC's regular practice to send Christmas gifts to certain customers each year. Therefore, it is NECC's belief that company names on such a list were customers for that year or in prior years. A copy of the 1968 Christmas Gift List is attached, which contains the names of these customers as of 1968 (See Tab A). The 1968 Christmas Gift List also indicates contact information for many of the named companies. Where available, the document indicates the addresses for such companies as of 1968.

NECC also found order records from July and August of 1971, which list the names of companies to whom NECC sold barrels (the "Order Records," See Tab B). Although the Order Records document sales of barrels, NECC picked up and reconditioned barrels from almost all of the named companies. Further, NECC found a release of liability letter from George Mann & Co., Inc. signed by George Wilson, Sr. and dated March 24, 1970 (the "George Mann & Co. Release Letter," See Tab C). Lastly, NECC found a hand written note to Teknor Apex (Pawtucket, Rhode Island), written on the back of a Metro-Atlantic Inc. Centredale facility Salesman's Report Form (the "Letter to Teknor Apex," See Tab D), which documents that NECC picked up closed head drums for reconditioning from Teknor Apex.

In answering this question, NECC, under the direction of Mr. Gene D'Onofrio, has relied on discussions with Thomas Lussier, Richard Costa, and the 1968 Christmas Gift List, the Order Records, the George Mann & Co. Release Letter, Letter to Teknor Apex, Raymond Nadeau's written statement to the EPA signed by Mr. Nadeau on October 27, 2000 (the "Nadeau Statement") and privileged attorney work product from NECC's former legal counsel.

3.q.i. identify (see Definitions) each such individual and entity who brought waste to the Site, including but not limited to each driver and his or her employer;

The following transporters brought drums to the Site to be reconditioned by NECC:

Efros Barrel (Providence, RI)
Matthews Barrel (Fall River, MA)
Woburn Barrel (Woburn, MA)

The following individuals are drivers, employed by NECC or Metro Atlantic, who brought drums from customers to the Site:

Former NECC employees:

Joseph Ciofelli (phonetic), [REDACTED]

Raymond A. Nadeau, [REDACTED]

Former Metro Atlantic employee:

John Palumbo, [REDACTED]

3.q.ii. describe the type and color of vehicle used by each individual and entity which brought waste to the Site including any distinctive markings or color;

Unknown

3.q.iii. describe the types of wastes brought to the Site by each individual and entity by date;

As noted above in 3.q.i., the entities listed brought drums to the Site to be reconditioned by NECC.

3.q.iv. describe the quantity of wastes brought to the Site by each individual and entity by date; and

The actual number of drums brought to the Site by each entity is unknown. Estimates of the number of drums brought to the Site from some of the listed companies are contained in the Nadeau Statement. Respondent has not been able to locate additional information to date to supplement this information.

3.q.v. indicate where on the Site the waste brought by each such individual or entity was placed or disposed (Respondent may provide a sketch).

The drums brought to the Site by NECC truck drivers, Metro-Atlantic truck drivers or other drum companies were reconditioned by NECC and resold. Respondent has not been able to locate additional records or information pertaining to the specific location of where specific entities' drums were placed at the site prior to reconditioning.

3.r. For each individual or entity who sent wastes to Respondent's facility at the Site through another individual or entity (i.e., those individuals and entities whose waste appeared at the Site but who did not bring the waste to the Site themselves):

In the 1999 §104(e) Request, EPA defined "waste" or "wastes" to "mean and include trash, garbage, refuse, by-products (including but not limited to dioxin and hexachloroxanthene), solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes." (emphasis added). NECC is, and during the relevant time period (1952-1971), was in the business of reconditioning drums. Because "waste" is defined to include "containers," NECC is responding to this question by listing those entities that arranged to have drums brought to the Site to be reconditioned.

In answering this question, NECC, under the direction of Mr. Gene D'Onofrio, has relied on discussions with Thomas Lussier, Richard Costa, and a review of the 1968 Christmas Gift List, the Order Records, the George Mann & Co. Release Letter, the Letter to Teknor Apex, the Nadeau Statement and privileged attorney work product from NECC's former legal counsel.

3.r.i. identify (see Definitions) each such individual or entity;

The following companies sent or arranged to have drums delivered to the Site to be reconditioned by NECC:

| Name of Company | Last Known Address |
|--------------------------|--|
| A. Harrison & Co. | 35 Hurdis St., No. Providence, RI; P.O. Box 494, Pawtucket, RI |
| Alltex Specialties | 65 Meadow St., Apponaug, RI |
| American Hoechst | 129 Quidnick St., Coventry, RI |
| American Mineral Spirits | 370 Allens Ave., Providence, RI |
| Bercen Chemical | 285 Valley St., Providence, RI |
| Cal Chemical | Arnold Rd., Coventry, RI |
| Cardinal Chemical | 1174 River St., Woonsocket, RI |
| Chemical Coating | East Providence, RI |
| Ciba Geigy | Cranston, RI |
| Cloro-Bac Products | Waterman Ave., Smithfield, RI |
| Clover Chemical | Unknown |
| CNC | 48 Hunt St., Central Falls, RI |
| Colfax Packing | 34 Colfax St., Pawtucket, RI |
| Colonial Chemical | 50 Armento St., Johnston, RI |
| Crown-Metro | 12 Dudley St., Providence, RI |
| Duoset | Rockville, CT |
| Duro Finishing | Fall River, MA |

| Name of Company | Last Known Address |
|------------------------------|---------------------------------------|
| Dytex Chemical | Central Falls, RI |
| Eastern Color & Chemical | 35 Livingston St., Providence, RI |
| Efros Barrel | Providence, RI |
| Esso Oil | East Providence, RI |
| Farrel Barrel | Unknown |
| French Worsted | Address unknown |
| Gannon | Warwick, RI |
| George Mann & Co. | Municipal Dock, Providence, RI |
| Giffordline Chemical Co. | 400 Station St., Cranston, RI |
| Greenville Finishing | Greenville, RI |
| Industrial Solvents | Wilkinsville, MA |
| Kraus Chemical Co | Valley St., Providence, RI |
| Lubrx Products, Inc | East Washington St., N. Attleboro, MA |
| Malden Mills | Lawrence, MA |
| Mancor Chemical Co. | 100 Dexter St., Pawtucket, RI |
| Matthew Barrel | Fall River, MA |
| Narragansett Wire | Unknown |
| Organic Chemical | 84 Valley St., E. Providence, RI |
| Original Bradford Soap Works | 200 Providence St., West Warwick, RI |
| Otis Air Base | Falmouth, MA |
| Paragon Chemical Co. | Cook St., Lincoln, RI |
| Philipp Brothers Chemical | Holbrook, MA |
| Plymouth Rubber | Canton, MA |
| Quonset Naval Base | Warwick, RI |
| R.I. Chemical Company | 124 Calder St., Cranston, RI |
| Raymond Barrel | Unknown |
| Ronnoco | Address unknown |
| Seratex | Unknown |
| Synthron Inc | Ryan Ave., Cumberland, RI |
| T.H. Baylis | Warwick, RI |
| Teknor Apex | Pawtucket, RI |
| Thompson Chemical Co. | 505 Central Ave., Pawtucket, RI |
| U.S. Oil Co. | Dexter Rd., East Providence, RI |
| Universal Chemicals Corp. | 1224 Mendon Rd., Cumberland, RI |
| Warwick Chemical Co. | Wood River Jct., RI |
| Wayland Chemical Co. | Industrial Circle, Lincoln, RI |
| Woburn Barrel | Woburn, MA |
| Woonsocket Color & Chemical | Sunnyside Ave., Woonsocket, RI |
| Worster Textile | Graystone, RI |

3.r.ii. identify (see Definitions the individual or entity that brought that waste to the Site;

Drums were picked up and brought to the Site by NECC employees, Metro-Atlantic employees, or by other transporters (i.e., drum companies) (See Response to Question 3.q.)

3.r.iii. state the dates the waste was brought to the Site;

The barrels were brought to the Site at some time between 1952 and some point of time during the summer of 1971 for reconditioning by NECC.

3.r.iv. describe the types of waste brought to the Site from each such individual or entity;

| <u>Name of Company</u> | <u>Type of Drum Sent to Site</u> |
|--------------------------|--------------------------------------|
| A. Harrison & Co. | Closed head drums |
| Alltex Specialties | Unknown |
| American Hoechst | Open head drums Closed head drums |
| American Mineral Spirits | Closed head drums |
| Bercen Chemical | Closed head drums |
| Cal Chemical | Closed head drums |
| Cardinal Chemicals | Closed head drums |
| Chemical Coating | Open head drums |
| Ciba Geigy | Open head drums Closed head drums |
| Cloro-Bac Products | Closed head drums |
| Clover Chemical | Closed head drums |
| CNC | Open head drums Closed head drums |
| Colfax Packing | Open head drums |
| Colonial Chemical | Unknown |
| Crown Metro | Open head drums Closed head drums |
| Duonet | Unknown |
| Duro Finishing | Open head drums |
| Dytex Chemicals | Closed head drums |
| Eastern Color & Chemical | Open Head drums Closed head drums |
| Efros Barrel | Open head drums Closed head drums |
| Esso Oil | Closed head drums |

| <u>Name of Company</u> | <u>Type of Drum Sent to Site</u> |
|-------------------------------|---|
| Farrel Barrel | Open head drums Closed head drums |
| French Worsted | Unknown |
| Gannon | Closed head drums |
| George Mann & Co. | Closed head drums |
| Giffordline Chemical Co. | Unknown |
| Greenville Finishing | Open head drums Closed head drums |
| Industrial Solvents | Open head drums |
| Kraus Chemical Co. | Closed head drums Open head drums |
| Lubrx Products Inc. | Closed head drums |
| Malden Mills | Open head drums Closed head drums |
| Mancor Chemical Co. | Unknown |
| Matthew Barrel | Open head drums Closed head drums |
| Narragansett Wire | Closed head drums |
| Organic Chemical | Closed head drums |
| Original Bradford Soap Works | Closed head drums |
| Otis Air Base | Closed head drum |
| Paragon Chemical Co. | Unknown |
| Philipp Brothers Chemical | Unknown |
| Plymouth Rubber | Open head drums |
| Quonset Naval Base | Closed head drums |
| R.I. Chemical company | Closed head drums |
| Raymond Barrel | Open head drums Closed head drums |
| Ronnoco | Unknown |
| Seratex | Unknown |
| Synthron Inc. | Open head drums Closed head drums |
| T.H. Baylis | Closed head drums |
| Teknor Apex | Closed head drums |
| Thompson Chemical Co. | Unknown |
| U.S. Oil Co. | Closed head drums |
| Universal Chemicals Corp. | Unknown |
| Warwick Chemical Co. | Unknown |
| Wayland Chemical Co. | Unknown |
| Woburn Barrel | Open head drums Closed head drums |
| Woonsocket Color & Chemical | Closed head drums |
| Worster Textile | Unknown |

3.r.v. describe the quantity of waste brought to the Site from each such individual or entity; and

The actual number of drums brought to the Site by each entity is unknown. Estimates of the number of drums brought to the Site from some of the listed companies are contained in the Nadeau Statement. Respondent has not been able to locate additional information to date to supplement this information.

3.r.vi. describe where each such individual's or entity's waste was disposed/placed at the Site.

The drums brought to the Site by NECC truck drivers, Metro-Atlantic truck drivers or other drum companies were reconditioned by NECC and resold. Respondent has not been able to locate additional records or information pertaining to the specific location of where specific entities' drums were placed at the site prior to reconditioning.

8. Describe all sources reviewed or consulted in responding to this request, including but not limited to: the names of all individuals consulted; the current job title and job description of each individual consulted; the job title and job description during the period being investigated of each individual consulted, whether each individual consulted is a current or past employee of Respondent, the names of all divisions or offices of Respondent for which records were reviewed; the nature of all documents reviewed; and the location where those documents reviewed were kept prior to review and the location where those documents reviewed are currently kept.

| <u>Name</u> | <u>Current Job title and Description</u> | <u>Job Description During the Period Being Investigated</u> | <u>Current/Past Employee of NECC?</u> |
|----------------|---|--|---|
| Thomas Lussier | Retired | Administrative Manager, Purchasing, Director of Operations, Vice-President January 17, 1971 – August 2000 | Past NECC Employee |
| Richard Costa | Vice President of Engineering and Environment | 1973 to Present | Current NECC Employee |
| Gene D'Onofrio | Unknown | 1992 to 2002 | Past NECC Employee (Vice President of Finance and Director of Operations) |

The nature of documents reviewed were: Nadeau Statement and privileged attorney work product from NECC's former legal counsel. The following documents were also reviewed: NECC Christmas Gift List, the Order Records, the George Mann & Co. Release Letter, and the Letter to Teknor Apex. These documents were originally reviewed at the Smithfield facility of NECC and are currently kept at that location.

2000 §104(e) Request:

NECC has previously responded in question 1 of the 2000 § 104(e) Request response that NECC conducted operations at the Site from approximately 1952 to 1969. Based on further investigation, NECC continued its operations at the Site through some point in time during the summer of 1971. Mr. Bernard Buonanno, who was responsible for the operations at NECC's Centredale facility, maintained his office at the Site through some point in time during the summer of 1971. As stated previously in response to question 3.b. of the 1999 § 104(e) Request above, NECC amends its previous responses to the 2000 § 104(e) Request regarding the ending date of its operations at the former Centredale facility: NECC operated at its former Centredale facility from 1952 through some point in time during the summer of 1971.

2e. How many employees worked at the New England Container Company, Inc. facility located at the Site between 1952 and 1969? Identify (see definitions) each and every employee who worked at the New England Container Company, Inc. facility located at the Site between 1952 and 1969, provide a description of the job duties of each and every employee, and state the years each employee worked at the New England Container Company, Inc. facility.

The total number of employees that worked at NECC's former Centredale facility has been previously estimated to be approximately 10 employees (other than Vincent J. Buonanno and Bernard Buonanno). To the extent possible, NECC is providing additional information about NECC's employees for the Centredale facility below:

| Name | Position Held | Duration of Employment |
|----------------------------|--------------------------|---|
| Joseph Ciofelli (phonetic) | Truck driver | Unknown |
| Anthony Coletta | Laborer | Unknown |
| Edmund Izzo | Laborer | 1959-1969 |
| John McCuskey (phonetic) | Supervisor | Unknown |
| Joseph Nadeau | Laborer | 1962-1965 1962 (summer), 1963 (summer), 1964-1965 |
| Raymond A. Nadeau | Laborer and truck driver | 1956-1969 |
| Tom Taylor | Laborer | 1967 - approximately 1976 |
| John Turcone | Laborer | 1963-1965 (part-time) |

The following documents were reviewed to answer the above question:

- A written statement to the EPA signed by Mr. Edmond Izzo on October 28, 2000 (the “Izzo Statement”)
- A written statement to the EPA signed by Mr. Joseph Nadeau on January 20, 2001 (the “J. Nadeau Statement”)
- The Nadeau Statement
- Privileged attorney work product of former NECC legal counsel
- 11/30/99 EPA administrative deposition of John Turcone

2.f. Describe the current location of any documents related to the operations of the New England Container Company, Inc. between 1952 and 1969. If any documents related to the operations of the New England Container Company, Inc., between 1952 and 1969 have been disposed of, identify the location and method of disposal.

The documents related to the operations of NECC between 1952 and 1971 are currently kept at:

NECC Smithfield facility, 455 George Washington Highway, Smithfield, RI 02917-1996

2.g. For every drum obtained by the New England Container Company, Inc. between 1952 and 1969:

NECC cannot identify the source of each individual drum obtained and reconditioned at the Site between 1952 and 1971. However, NECC has identified customers from whom it purchased drums to be reconditioned or for whom it reconditioned drums, and to whom it sold reconditioned drums. Further, NECC has included in its response, former customers that sent or arranged to have barrels sent through the summer of 1971.

In answering this question, NECC, under the direction of Gene D’Onofrio, has relied on discussions with Thomas Lussier, Richard Costa, and a review of the 1968 Christmas Gift List, the Order Records, the George Mann & Co. Release Letter, the Letter to Teknor Apex, the Nadeau Statement, and privileged attorney work product from NECC’s former legal counsel.

2.g.i. Identify (see Definition) the source of the drum (including but not limited to DuPont, Monsanto, Merck and/or Hercules), if applicable

| Name of Company | Last Known Address |
|-------------------|---|
| A. Harrison & Co. | 35 Hurdis St., No. Providence, RI; P.O. Box |

| Name of Company | Last Known Address |
|------------------------------|---------------------------------------|
| | 494, Pawtucket, RI |
| Alltex Specialties | 65 Meadow St., Apponaug, RI |
| American Hoechst | 129 Quidnick St., Coventry, RI |
| American Mineral Spirits | 370 Allens Ave., Providence, RI |
| Bercen Chemical | 285 Valley St., Providence, RI |
| Cal Chemical | Arnold Rd., Coventry, RI |
| Cardinal Chemical | 1174 River St., Woonsocket, RI |
| Chemical Coating | East Providence, RI |
| Ciba Geigy | Cranston, RI |
| Cloro-Bac Products | Waterman Ave., Smithfield, RI |
| Clover Chemical | Unknown |
| CNC | 48 Hunt St., Central Falls, RI |
| Colfax Packing | 34 Colfax St., Pawtucket, RI |
| Colonial Chemical | 50 Armento St., Johnston, RI |
| Crown-Metro | 12 Dudley St., Providence, RI |
| Duonet | Rockville, CT |
| Duro Finishing | Fall River, MA |
| Dytex Chemical | Central Falls, RI |
| Eastern Color & Chemical | 35 Livingston St., Providence, RI |
| Efros Barrel | Providence, RI |
| Esso Oil | East Providence, RI |
| Farrel Barrel | Unknown |
| French Worsted | Address unknown |
| Gannon | Warwick, RI |
| George Mann & Co. | Municipal Dock, Providence, RI |
| Giffordline Chemical Co. | 400 Station St., Cranston, RI |
| Greenville Finishing | Greenville, RI |
| Industrial Solvents | Wilkinsville, MA |
| Kraus Chemical Co | Valley St., Providence, RI |
| Lubrx Products, Inc | East Washington St., N. Attleboro, MA |
| Malden Mills | Lawrence, MA |
| Mancor Chemical Co. | 100 Dexter St., Pawtucket, RI |
| Matthew Barrel | Fall River, MA |
| Narragansett Wire | Unknown |
| Organic Chemical | 84 Valley St., E. Providence, RI |
| Original Bradford Soap Works | 200 Providence St., West Warwick, RI |
| Otis Air Base | Falmouth, MA |
| Paragon Chemical Co. | Cook St., Lincoln, RI |
| Philipp Brothers Chemical | Holbrook, MA |
| Plymouth Rubber | Canton, MA |
| Quonset Naval Base | Warwick, RI |
| R.I. Chemical Company | 124 Calder St., Cranston, RI |
| Raymond Barrel | Unknown |

| Name of Company | Last Known Address |
|-----------------------------|---------------------------------|
| Ronnoco | Address unknown |
| Seratex | Unknown |
| Synthron Inc | Ryan Ave., Cumberland, RI |
| T.H. Baylis | Warwick, RI |
| Teknor Apex | Pawtucket, RI |
| Thompson Chemical Co. | 505 Central Ave., Pawtucket, RI |
| U.S. Oil Co. | Dexter Rd., East Providence, RI |
| Universal Chemicals Corp. | 1224 Mendon Rd., Cumberland, RI |
| Warwick Chemical Co. | Wood River Jct., RI |
| Wayland Chemical Co. | Industrial Circle, Lincoln, RI |
| Woburn Barrel | Woburn, MA |
| Woonsocket Color & Chemical | Sunnyside Ave., Woonsocket, RI |
| Worster Textile | Graystone, RI |

8. Describe all sources reviewed or consulted in responding to this request, including but not limited to: the names of all individuals consulted; the current job title and job description of each individual consulted; the job title and job description during the period being investigated of each individual consulted, whether each individual consulted is a current or past employee of Respondent, the names of all divisions or offices of Respondent for which records were reviewed; the nature of all documents reviewed; and the location where those documents reviewed were kept prior to review and the location where those documents reviewed are currently kept.

| <u>Name</u> | <u>Current Job title and Description</u> | <u>Job Description During the Period Being Investigated</u> | <u>Current/Past Employee of NECC?</u> |
|----------------|---|--|--|
| Thomas Lussier | Retired | Administrative Manager, Purchasing, Director of Operations, Vice-President January 17, 1971 – August 2000 | Past NECC Employee |
| Richard Costa | Vice President of Engineering and Environment | 1973 to Present | Current NECC Employee |
| Gene D'Onofrio | Unknown | 1992 to 2002 | Past NECC Employee (Vice President of Finance and Director of Operations) |

The nature of documents reviewed were: the Nadeau Statement, the Izzo Statement, the J. Nadeau Statement, 11/30/99 EPA administration deposition of John Turcone and privileged attorney work product of former NECC legal counsel. The following documents were also reviewed: NECC Christmas Gift List, the Order Records, the George Mann & Co. Release Letter, and the Letter to Teknor Apex. These documents were originally reviewed at the Smithfield facility of NECC and are still kept at that location.

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of New England Container Company, Inc. and that the foregoing is complete, true and correct.

Executed on February 8, 2002.



Signature

Robert Baker

Type Name

Vice-President of Operations, NECC

Title

NEW ENGLAND CONTAINER

Christmas Gift List

Alltex Specialties

✓ Peter Daley

65 Meadow St.
Apponaug, R.I.

American Mineral Spirits

Ike Giese ✓

370 Allens Ave.
Providence

American Hoechst

✗ Cal Cragucher

✗ ~~Charles Young~~

✗ ~~Hart~~

129 Quidnick St.
Coventry

T.H. Baylis

Tom Baylis ✓

Bercen Chemical

Bryan Adriance ✓ S

285 Valley St.
Providence

Cal Chemical

Chuck Lamandola ✓

616 Washington St.
Coventry

Cardinal Chemical

Al Viola ✓

1174 River St
Woonsocket

Colonial Chemical

Severino Natale ✓ S

50 Armento St.
Johnston, R.I.

Choro-Bac Products

✓ Mike McMichael

Waterman Ave
Smithfield

Crown-Metro

Jay Buonanno ✓

Tom DiPietro

Bob Castro

12 Dudley St.
Providence

CNC

Henry Noon - S
Bob Carlson - S
Ralph Carlson - S

48 Hunt St.
Central Falls

Colfax Packing

Earl, Abbott S
Srd, Morris Dressler

34 Colfax St
Pawtucket

Eastern Color & Chem

Mike, Joe Shepard
John Aranian - L

35 Livingston St.
Providence

French Worsted

Emile Benoit

Giffordline Chemical Co.

Art Wilks - S

400 Station St.
Cranston

A Harrison & Co.

Allen Harrison S
Pat Raccio S
Jim Falcon - S

35 Hurdia St.
No. Providence

P.O. Box 494
Pawtucket

Kraus Chemical Co.

Bernie Kraus X

24 Chalkstone Ave
Providence

Lubrx Products Inc.

John Plath X
Skip X

East Washington St.
N. Attleboro, Mass

Mancor Chemical Co.

Jerry Newman - L

100 Dexter St
Pawtucket

George Mann & Co.

George Mann X
Dan - S

Municipal Dock
Providence

Organic Chem

Frank Gonsalves - S

84 Valley St.
E. Providence

Original Bradford Soap Works

Reg Hayward ✓ L
Alan Howland ✕
~~Mike~~ Green ✓ L
John

Paragon Chemical Co.

200 Providence St.
West Warwick, R.I.

Cook St.
Lincoln, R.I.

Philipp Brothers Chem.

✕ Dino Besaro ✕

Holbrook, Mass

R. I. Chemical Company

Joe D'Antonio

124 Calder St.
Cranston, R.I.

Ronnoco

Synthron Inc.

Irving Zemmetkin ✓
Mrs. Smith ✓ L
Russ Platt ✓ L

Ryan Ave.
Cumberland, R.I.

Thompson-Chemical Co.

Bud Wahl ✓ L

505 Central Ave
Pawtucket, R.I.

Universal Chemicals Corp.

Jack Katz ✓ L

1224 Mendon Rd.
Cumberland, R.I.

U. S. Oil Co.

Joe Pryor ✓ L
Art Wunschel ✓ L

Dexter Rd.
East Providence

Warwick Chemical Co.

Ed Smith
Mrs. Mildred Baril ✓ L
Frank DiLillo ✓
Ed Robertson ✓ S
Cressley ✓ L
John

Wood River Jct.
R. I.

Woonsocket Color & Chemical

Esmond O'Donnell ✓ L

Sunnyside Ave
Woonsocket, R.I.

Wayland Chemical Co.

Jake Sarkisian ✓ L

Industrial Circle
Lincoln, R.I.

1971

ORDER RECORD

Week Ending JULY 23

MONDAY JULY 19

| # | CUSTOMER | PO | OH | BY | BTL | MISC | REMARK |
|---|------------------------|----|----------------|----------------|-----|------|---------------|
| # | GEIGY | | 225 | 75 | | | |
| | HOECHST | | | 240 | | | |
| | THIS SOLV | | 225 | | | | |
| | Plymouth | | 150 | | | | |
| | Rush Master | | | 26 | | | 10 x 30 g. BT |
| | TEXNOR APEX | | | 150 | | | |
| | | | 615 | 75 | | | 111 |

TUESDAY JULY 20

OH UL L

| CUSTOMER | OH | UL | L | | | |
|------------------|---------------|-----|----|--|--|---------------|
| ✓ GEIGY | 225 | 50 | | | | |
| ✓ EASTERN OIL | 75 | | 25 | | | 22 x 30 g. BT |
| AMERICAN MINERAL | | 150 | | | | |
| HEBRONVILLE PA. | | | | | | |
| ✓ TEXNOR APEX | | 75 | | | | |
| ✓ U.S. OIL | | 50 | | | | UNPAINTED |
| 1415 SOLV. | 200 | | | | | |
| CROWN | 150 | | | | | |
| GEIGY | 75 | | | | | |
| HOECHST | 150 | | | | | |
| | 800 | 350 | | | | 372 |

Form 483

WEDNESDAY

JULY 21

| CUSTOMER | PO | ON | BTH | BTL | MISC | REMARKS |
|---------------|----|---------------|-----|-----|------|----------------|
| GEIGY | | 225 | 75 | | | /// |
| EASTERN Color | | 75 | | 25 | | |
| TEKNOR | | | 75 | | | |
| US OIL | | | 50 | | | Tri Sure Bings |
| ISQUINN | | | | | | |
| LAINEX | | 50 | 35 | | | Before 11 A.M. |
| AMER MIN | | | 50 | | | East Prov. |
| CROWN | | 50 | | | | |
| CVC | | 50 | | | | /// |
| Knockout | | 220 | | | 313 | /// |

THURSDAY

JULY 22

796

| CUSTOMER | PO | ON | BTH | BTL | MISC | REMARK |
|----------------|----|-----|----------------|----------------|------|-----------------------|
| GEIGY | | 225 | 25 | | | • • • • |
| Harrison | | 50 | | | | |
| PLT FISH | | 8 | | | | /// |
| AMER. MIN. | | | 100 | 150 | | East Prov. |
| CROWN | | 100 | | | | |
| CVC | | 100 | | | | /// |
| Forrell | | | 186 | | | |
| Benis | | | | | | 340 |
| 100 | | | | | | |
| AMER MIN | | | 135 | | | E Prov. |
| | | | - 0 | | 381 | |

FRIDAY July 25

1137

823-
222

| CUSTOMER | PO | OTH | BTQ | BYL | MISC | REMARKS |
|------------------|----|-----|-----|-----|------|------------|
| GEIGY | | 225 | 50 | | | |
| | | | | | | |
| | | | | | | |
| GEIGY | | | | | | |
| CROWN | | 150 | | | | |
| BAYLIS | | | 120 | | 60 | Poly Drums |
| DAN O'CONNOR | | | 5 | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

177

1137 235 1372

1137
235
1372

ORDER RECORD

Week Ending Aug 6, 19MONDAY Aug 2

| CUSTOMER | PO# | OH | BT-U | BT-L | MISC. | REMARKS |
|--------------|-----|-----|------|------|----------|---------|
| CUSTOMER | | | | | | |
| Knicker | | 440 | | | | |
| KJ QUINN | | | | | | |
| E & C | | 100 | | | | |
| Knicks | | | 30 | | Early AM | |
| BRUCE DIMOND | | | | | 12x30 | Gal |
| CLOVER CHEM | | | | 20 | Bl + W. | |
| COLFAX | | 220 | | | | |
| | | | | | | |
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TUESDAY Aug 3

| CUSTOMER | PO | OH | BTU | BT-L | MISC | REMARKS |
|------------------|----|-----------------|---------------|------|-------------|---------|
| KJ QUINN | | 257 1 25 Reg | | | | |
| A. HARRISON | | | 25 | | Yellow Tans | |
| CRIG-BRAD | | 45 | | 55 | | |
| Plymouth | | 150 | | | | |
| TEKNOR-ABBRAMILE | | | | | | PICKUP |
| TEKNOR (Helm) | | | 150 | | | |
| FABRILL | | 112 | Double | | | |
| | | | 17 x 46 Gauge | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

WEDNESDAY July 5

| | CUSTOMER | PO# | OH | BT-U | BT-L | MTSC. | REMARKS |
|--|--------------------|-----|---------------|------|---------------|-------|---------------|
| | HCCCAST | | 050 | | | | |
| | HCCCAST | | 220 | | | | |
| | CRGANIC | | 25 | | | | |
| | COLFAX | | 220 | | | | |
| | ECYC | | 50 | 30 | 20 | | XTRA NEW RING |
| | CRANN | | 130 | 20 | | | |
| | CRPLANO | | | | | | |
| | HCCCAST | | 25 | | | | |
| | GANNON | | | 30 | | | |
| | | | | | | | |
| | | | | | | | |

THURSDAY Aug 5

| | | | | | |
|--------------|--|--|--------|----|--------------|
| CLODZ 2MFP | | | | | |
| CHEM COATING | | | 30 | | |
| BAKES | | | | 50 | Filter drums |
| New Wire | | | PICKUP | | |
| Seratex | | | PICKUP | | |

FRIDAY _____

| | CUSTOMER | PO# | OH | BT-U | BT-L | MISC. | REMARKS |
|--|---------------|-----|----|------|------|-------|---------|
| | EASTERN CALIF | | | 25 | 35 | | |
| | TEKHOR - APEX | | | 100 | | | |
| | | | | | | | |
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TUES AUG 10

KRAUS CASH — 65 UL OIL
THUR - AMER MILK



GEORGE MANN & CO., INC.

MERCHANDISE AND DISTRIBUTORS OF INDUSTRIAL CHEMICALS

P. O. BOX 1535 • PROVIDENCE, RHODE ISLAND 02901

MAIN OFFICE AND PLANT:
HARBORSIDE BOULEVARD • MUNICIPAL DOCK
TELEPHONE 401 781-5600

BRANCH OFFICE AND PLANT:
105 CENTRAL STREET • STONEHAM, MASS. 02180
TELEPHONE 617 438-1335

Release of Liability

This is to certify that the G. E. Wilson Company will not hold Atlas Barrell and Pallett Company, nor New England Container Company liable for any damages caused by the purchase of Sulphur-Trioxide drums.


George Wilson Sr.

March 24, 1970

John Potter,
Telmer apex
Pantucket

Thank you for listening to me ~~the~~ last
~~other day~~ week concerning our price
of reconditioned closed head drums.

As you requested I shall try to
describe what we have been doing
in servicing your account ~~in~~ in Delmonville
~~which is the same~~

for many years, and which I think has
been quite satisfactory in quality.

Generally we pick up drums from
both Delmonville and Pantucket. Many of
the drums in Pantucket in the past
have been used several times by your
company before we collect them, which
of course, is good management on your part.

We on the other hand have replaced
many of these rejects with our own drums
at a higher cost to us. ~~We are now~~
~~going to sell your reject drums, which we~~
~~pay you for 75¢ each.~~ In the past
many of our drums which we exchanged for yours
were ~~15 gauge~~ ~~and~~ at the lighter 20 gauge

METRO - ATLANTIC

INC.

CENTREDALE 11, R. I.

SALESMAN'S REPORT

Salesman Date

Firm.....

Kind.....City.....

Interview Title.....

FORM 2

STATE 4866-2M-S

| Competitive Product in Use (or quoted) | Competitive Sell'r | Price | Corresponding Product | Quoted |
|--|--------------------|-------|-----------------------|--------|
| | | | | |
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REMARKS

ORDERS

SAMPLES

drum which ~~we~~ picked up from your
yard. ~~#~~ / 2,

I hope I have not confused you but
I think you ~~will find~~ have found that
our drum processing ~~has not been~~
~~for some time~~ which includes ~~no~~ detection
& acoustic leak detecting ~~and~~ has resulted
in ~~for some time~~ a satisfactory
container with few complaints.

~~We would like to quote the~~
~~following new prices~~

Concerning price adjustment we shall
charge \$2.60 each for servicing ~~the~~
closed head drums supplied by you.

For instance if we pick up 100 of your drums
and find ~~one~~ leaks or rejects we would
credit you 25¢ each for the five rejects and
charge ~~for~~ \$2.60 ea. for the balance of 95 drums.

~~We~~ would be happy to continue
serving your needs as carefully as possible,
and we thank you for your consideration
of our company in the past.

U T f

METRO - ATLANTIC

INC.

CENTREDALE 11, R. 1.

SALESMAN'S REPORT

Salesman Date

Firm

Kind City

Interview Title

FORM 2

STATE 4886-2M-8-5

| Competitive Product in Use (or quoted) | Competitive Sell'r | Price | Corresponding Product | Quoted |
|--|--------------------|-------|-----------------------|--------|
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REMARKS

ORDERS

SAMPLES